

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
Statesville Division

CROWN EQUIPMENT CORPORATION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 5:23-cv-00059-KDB-DCK
	)	
DAVID BRADY, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**MOTION FOR EXTENSION OF TIME TO ANSWER**

Defendants, David Brady (“Brady”), William Tucker (“Tucker”), Brawtus Holding Company, Inc. (“Brawtus Holding”), Brawtus Management Company, LLC (“Brawtus Management”), and Pneu-Mech Dissolution LLC, formerly known as Pneu-Mech Systems Manufacturing LLC (“the LLC”), hereby submit this motion requesting an extension of time to answer or otherwise plead in the above-captioned matter. In support of this motion, these Defendants state as follows:

1. On August 21, 2023, the Defendants timely filed a Motion to Dismiss for Failure to State a Claim (Doc. 37).
2. On February 23, 2024, Magistrate Judge Keesler issued his Memorandum and Recommendations on Defendants’ aforementioned motion to dismiss (Doc. 48).
3. On March 21, 2024, Judge Bell entered an Order affirming Magistrate Judge Keesler’s Memorandum and Recommendations, denying Defendants’ motion to dismiss (Doc. 52).
4. The time to answer or otherwise plead runs through April 04, 2024, and has not yet expired.

5. On March 28, 2024, the undersigned counsel attempted to confer with all counsel of record in this matter via email, wherein the undersigned asked for consent to an extension of time to answer or otherwise plead.

6. Later that same day, Attorney Toby Henderson, counsel for Plaintiff, responded to the email and noted that Plaintiff would not oppose an extension to April 18, 2024.

7. The undersigned has not received a response from any other counsel in this matter.

8. Defendants' counsel is diligently working on preparing filings for the Defendants.

9. Additional time is needed to adequately prepare all the necessary filings for these five (5) Defendants.

10. This Motion is not being made to cause unnecessary delay.

WHEREFORE, Brady, Tucker, the Brawtus Companies, and Pneu-Mech, LLC respectfully request that this Court grant an extension of time to answer or otherwise plead to April 18, 2024.

Dated: April 02, 2024.

BY COUNSEL

/John B. Riordan/

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Management Co., LLC, and Pneu-Mech Dissolution  
LLC*

## **CERTIFICATE OF SERVICE**

I hereby certify that on April 02, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which served the foregoing on the following counsel of record who are CM/ECF participants:

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